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14 **UNITED STATES DISTRICT COURT**
15 **CLARK COUNTY, NEVADA**

16 YVETTE RODRIGUEZ, an individual,

17 Plaintiff,

18 vs.

19 GEICO CASUALTY COMPANY, a Foreign
20 Corporation, DOES I through X; and ROE
21 BUSINESS ENTITIES 1 through X, inclusive,

22 Defendants.

Case No.: 2:18-CV-01070-MMD-CWH

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE AN
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT OR
IN THE ALTERNATIVE, TO
SEVER/ BIFURCATE AND TO STAY
CLAIMS FOR BAD FAITH**

FIRST REQUEST

26 Plaintiff, Yvette Rodriguez, by and through her attorneys of record, Kevin R. Hansen, Esq.,
27 and Amy M. Wilson, Esq., of the Law Office of Kevin R. Hansen, and Brent T. Ellison, Esq., of
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1 the Law Office of Brent Ellison, and Defendant, Geico Casualty Company, by and through their
2 attorneys of record, Wade M. Hansard, Esq., Jonathan W. Carlson, Esq., and Renee M. Maxfield,
3 Esq., of the law firm of McCormick, Barstow, Sheppard, Wayte & Carruth, L.L.P., hereby file
4 this Stipulation and Order to Extend by one (1) week, the Deadline for Plaintiff to file an
5 Opposition to Defendant's pending Motion to Dismiss Plaintiff's First Amended Complaint or in
6 the alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith which was filed with this
7 Court on November 26, 2018.

9 IT IS HEREBY STIPULATED AND AGREED between the parties that Plaintiff, Yvette
10 Rodriguez, shall be provided an one (1) week extension of time to file an Opposition to
11 Defendant's pending Motion to Dismiss Plaintiff's First Amended Complaint or in the
12 alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith.

14 IT IS HEREBY STIPULATED AND AGREED between the parties that the deadline date
15 for Plaintiff, Yvette Rodriguez, to file an Opposition to Defendant's pending Motion to Dismiss
16 Plaintiff's First Amended Complaint or in the alternative, to Sever/Bifurcate and to Stay Claims
17 for Bad Faith shall be extended from December 10, 2018 to December 17, 2018.

19 Plaintiff's request to Defendant for a stipulated agreement to extend the date for the filing
20 of Plaintiff's Opposition to Defendant's pending Motion to Dismiss Plaintiff's First Amended
21 Complaint or in the alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith was made in
22 good faith due to an illness or health related problems on behalf of Plaintiff's counsel and will
23 not cause any undue delays herein.

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1 Dated this 10th day of December, 2018.

2 Law Office of Brent Ellison

McCormick, Barstow, Sheppard, Wade &
Carruth, L.L.P.

3
4 /s/ Brent T. Ellison

/s/ Jonathan W. Carlson

5 _____
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*Attorney for Defendant, Geico Casualty
Company*

10 **ORDER**

11 Based on the foregoing stipulations and agreements of the parties, and good cause
12 appearing,
13

14 IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

15 1. That Plaintiff, Yvette Rodriguez, shall be provided an one (1) week extension of
16 time to file an Opposition to Defendant's pending Motion to Dismiss Plaintiff's First Amended
17 Complaint or in the alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith; and
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19 2. That the new deadline date for Plaintiff, Yvette Rodriguez, to file an Opposition
20 to Defendant's pending Motion to Dismiss Plaintiff's First Amended Complaint or in the
21 alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith shall be extended from
22 December 10, 2018 to December 17, 2018.
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24 Dated this 11th day of December, 2018.

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Miranda M. Du
United States District Judge
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of December, 2018, a true and correct copy of the foregoing Stipulation and Order to Extend Time to File an Extension to Defendant's Motion to Dismiss Plaintiff's First Amended Complaint or in the Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic service to counsel of record receiving electronic notification.

/s/ Melissa I. Sandoval

An employee of the Law Office of Brent Ellison